

REMARKS

Reconsideration of the present application is respectfully requested.

Claims 1-14 stand rejected under 35 USC §103(a) over Mann. Applicants respectfully disagree since Mann teaches a distinctly different structure from Applicants' claimed filter assembly, engines and methodology; and, Mann includes no teaching suggestion or incentive for modifying his filter assembly structure to arrive at Applicants' claimed invention. With regard to claim 1, it specifically requires a center support with a filter head attachment at one end and a bowl attachment adjacent its other end. Applicants respectfully assert that the claim term "attachment" has been overlooked at arriving at the cited rejections. In other words, Mann teaches abutment surfaces on the thing identified as its center of support, but it includes nothing that could be fairly characterized as an attachment. An abutment surface can not be fairly characterized as an attachment. Webster's dictionary defines attachment as "a physical connection by which one thing is attached to another". The feature identified in the Mann reference is held in abutment contact with the filter head via bolt 42, but again, abutment is not attachment. There should be no dispute that Mann includes absolutely no teaching suggestion or incentive for abandoning its bolts in favor of a center support that provides the necessary head and bowl attachments as in Applicants' claimed invention. Therefore, Applicants respectfully request that the outstanding rejections against claims 1-8 be withdrawn.

Claim 2 should be allowable over and above claim 1 since it explicitly requires that the metallic filter element be surrounded by the bowl. There should be no dispute that Mann can not meet this limitation. Therefore, claim 2 should be allowable over and above the reasons set forth with regard to claim 1.

Claim 7 should also be allowable over and above the reasons set forth with regard to claim 1 since its limitations were not even addressed in the office action, and Mann certainly fails to teach or suggest the inclusion of a hydrophobic coating on anything that could be characterized as a metallic screen filter element, as in Applicants' claimed invention. The Mann airline vapor trap is specifically directed toward trapping water vapor, rather than shunning the same. Therefore, even ignoring the fact that Mann is silent on this matter, one with ordinary skill in the art would not be lead to modify Mann to include a hydrophobic coating, since inclusion of the same would confound the intended operation of the Mann vapor trap. If anything one with ordinary skill might include a hydrophilic coating. Therefore, Applicants respectfully request

that the rejection against claim 7 be withdrawn over and above the reasons set forth with regard to claim 1.

Claim 8 should be allowable over and above the reasons set forth with regard to claim 1 since it specifically requires that the center support is necessary for connecting the bowl in sealing contact with the filter head. The identified bowl in Mann is not in contact with its filter head, and therefore, Mann is inherently incapable of meeting the limitations of claim 8. Therefore, Applicants respectfully request that claim 8 be shown allowable over and above the reasons set forth with regard to claim 1.

Claim 9 requires that a plurality of engines that include filter assemblies according to claim 1 with some having a paper filter element in place of the metallic screen element alternative. Apart from the fact that the office action appears to simply ignore claims 9-11, no one with ordinary skill in the art would be motivated to so extensively modify the Mann reference, and apply it to engines rather than airliners, in a way that could possibly allow Applicants' claims to be read thereon, without innovating, which is forbidden by the MPEP and relevant case law. Therefore, Applicants respectfully request that the rejections against claims 9-11 be withdrawn, or at least address these claims with specific reasoning as to how and why one with ordinary skill in the art could arrive at Applicants' claimed invention based upon any fair interpretation of the Mann teachings.

Claim 12 and its dependent claims should also be allowable over and above Mann since it does not show a center support that is capable of being detached from anything. While it is true that the thing identified as the Mann center support can be moved out of abutment contact with the respective filter head, there is no action that could be fairly characterized as detaching, as required by claim 12.

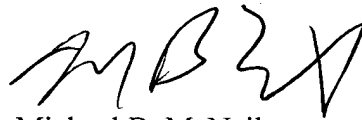
Claim 13 should be allowable over and above claim 12 since it specifically requires that the metallic screen filter element be detached from the center support. But again, the office action fails to specifically show where these features are shown or suggested by the Mann reference.

Claim 14 should also be allowable over Mann since Mann does not teach a filter assembly that includes the ability to attach one or the other of a metallic screen filter element or a paper filter element with the same filter head and bowl. Again, Applicants respectfully request that any succeeding office action specifically address Applicants claim limitations and how one

with ordinary skill in the art could possibly arrive at the same in view of any fair teachings of the cited reference, or the rejections should be withdrawn.

This application is believed to be in condition for allowance of claims 1-14. However, if the Examiner believes that some minor additional clarification would put this application in even better condition for allowance, the Examiner is invited to contact the undersigned attorney at (812) 333-5355 in order to hasten the prosecution of this application.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'MBM', with a stylized flourish at the end.

Michael B. McNeil
Reg. No. 35,949